24CO1:12-cv-01534 Mckay v. Branch et al

Robin Alfred Midcalf, presiding
Date filed: 09/05/2012
Date of last filing: 09/17/2012

History

Doc. No.	Date	es	Description		
<u>6</u>	Filed & Entered:	09/17/2012	Summons Returned Executed		
	Docket Text: SUMMONS Reanswer due 10/15/2012. Serv	ael Mckay. Will Branch served on 9/13/2012, wartz, Robert)			
<u>5</u>	Filed & Entered:	09/06/2012	Summons Issued		
	Docket Text: SUMMONS Issued as to John Does 1-10. (KI)				
2	Filed:	09/05/2012	Complaint		
	Entered:	09/06/2012			
	Docket Text: COMPLAINT against Will Branch, Branch Antique Heartpine and Cypress, LLC, John Does 1-10, filed by Michael Mckay. (Attachments: # (1) Civil Cover Sheet) (KI)				
<u>3</u>	Filed:	09/05/2012	Summons Issued		
	Entered:	09/06/2012			
	Docket Text: SUMMONS Is:	sued as to Will Branch. (K			
4	Filed:	09/05/2012	Summons Issued		
	Entered:	09/06/2012			
	Docket Text: SUMMONS Issued as to Branch Antique Heartpine and Cypress, LLC c/o Viron Will Branch, Registered Agent. (KI)				

	PAMEC Se	rvice Cente	er
	Transacti	on Receipt	
	10/11/201	2 12:21:08	
A 0.20 per	page cost goes i	into effect as	of 07/01/2011.
PAMEC Login:	do3948	Client Code:	2344-1
Description:	History/Documents	Search Criteria:	24CO1:12- cv-01534
Billable Pages:	1	Cost:	0.20



WILL BRANCH;

WILL BRANCH;

WILL BRANCH;

WILL BRANCH ANTIQUE HEARTPINE AND CYPRESS, LLC; AND

COMPLAINT

COMES NOW the Plaintiff, Michael McKay, by and through his undersigned counsel of record, Schwartz, Orgler & Jordan, PLLC, and files this his Complaint against the Defendants, and would respectfully show unto this Court the following, to-wit:

1.

The Plaintiff, Michael McKay, (hereinafter "McKay" or "Plaintiff") is an adult resident citizen of Harrison County, Mississippi.

2.

The Defendants herein are:

JOHN DOES 1-10

A. Will Branch (hereinafter "Branch"), is an adult resident citizen of the State of Louisiana who may be served with process at 520 St. Augustine Street, Bogalusa, Louisiana 70427 in any manner consistent with Rule 4 of the Mississippi Rules of Civil Procedure.

B. Branch Antique Heartpine and Cypress, LLC, a Louisiana Limited Liability Company (hereinafter "Branch Woods") which may be served with process upon its registered agent, Viron Will Branch, at 1412 Founder's Drive, Bogalusa, LA 70427.

Page 1 of 11

C. John Does 1-10, which may be other entities and/or persons who caused and/or

contributed to the damages described herein, and whose identities are currently unknown. Said John

Does, when their true identities are known, will be identified by name and joined in this action, if

necessary, pursuant to the Mississippi Rules of Civil Procedure.

D. All allegations in this Complaint against "Defendants" are made jointly against all named

Defendants, and all John Doe Defendants. Any amended complaint filed herein against John Does

will relate back to the date of this Original Complaint, pursuant to the Mississippi Rules of Civil

Procedure.

E. Branch is the owner, registered agent and member of Branch Woods, and Branch Woods

is the alter ego of Branch. Branch and Branch Woods are hereinafter collectively referred to as

"Defendants".

3.

A. This Court has jurisdiction over the subject matter and of the parties, and venue is proper

in this Court pursuant to the Mississippi Code of 1972 (as amended) in that the Defendants have

breached a contract and/or committed a tort in whole or in part in the First Judicial District of

Harrison County, Mississippi.

B. Additionally, the Defendants have conducted business in the First Judicial District of

Harrison County, Mississippi, entered into a contract(s) in the First Judicial District of Harrison

County, Mississippi, and have committed tortious injuries in whole or in part within the State of

Mississippi against resident citizens of the State of Mississippi.

C. Plaintiff further invokes the "long arm" statutes of Mississippi to the extent necessary.

D. Upon service of process this Court will maintain in personam jurisdiction over the *Defendants.

4.

During 2011, the Defendants, Branch and Branch Woods, entered into a lumber supply agreement with the Plaintiff, McKay, under the terms of which McKay agreed to furnish the Defendants with approximately forty thousand (40,000) board feet in Gulfport, Mississippi to be used by the Defendants for resale to the general public.

5.

In exchange for McKay's lumber supply, Branch and Branch Woods, agreed to pay McKay two dollars (\$2.00) per board foot for each piece of McKay's cypress lumber received and re-sold by Branch and/or Branch Woods.

6.

Branch and Branch Woods acknowledged the terms of the parties' agreement, including the pricing terms set forth hereinabove, and promised to make full payment when due.

7.

Subsequently, McKay furnished the total cypress lumber supply contemplated by the parties' agreement to Branch and Branch Woods. Following a pick up the first load of lumber from McKay, Branch paid McKay the approximate sum of seven thousand five hundred dollars (\$7,500.00), which represented McKay's portion of the sales proceeds from Branch's first sale of McKay's lumber.

8.

Thereafter, Branch and Branch Woods breached their agreement with McKay in that they have failed to pay McKay the additional amounts owed to McKay for the sale of his lumber under

Page 3 of 11

the terms of the agreement. In addition, Branch and Branch Woods have failed to produce or show any alleged unsold lumber to McKay, despite McKay's reasonable and repeated request to inspect the same.

9.

To date, Branch and Branch Woods are indebted to McKay (jointly and severally) in an amount not less than Seventy Two Thousand Five Hundred Dollars (\$72,500.00), which represents the cost of the cypress lumber furnish to Branch and Branch Woods by McKay, less the sum received by McKay.

10.

Branch and Branch Woods have failed to satisfy any portion of said indebtedness to McKay, despite McKay's written and verbal requests for the same.

11.

In addition to the aforesaid amounts and as a result of the Defendants's breach, McKay is entitled to recover his attorney's fees in the sum equal to one-third (1/3) of the amount due, being an amount not less than \$24,164.25. McKay further is entitled to recover pre-judgment and post-judgment interest at a rate of not less than Eight Percent (8%).

COUNT ONE BREACH OF CONTRACT

12.

The Plaintiff hereby reasserts and realleges each and every one of the foregoing paragraphs as if restated in full herein.

Defendants breached their verbal agreement with the Plaintiff by failing to pay for the cypress lumber furnished to them as and when due and are therefore indebted to the Plaintiff in an amount not less than \$72,500.00, together with attorney's fees one-third (1/3) of said amount being not less than \$24,164.25, for a total sum being due and outstanding to the Plaintiff in an amount not less than \$96,664.25.

COUNT TWO CONVERSION

14.

The Plaintiff hereby reasserts and realleges each and every one of the foregoing paragraphs as if restated in full herein.

15.

Plaintiff would hereby show that the Defendants have wholly converted to their own use property and/or monies rightfully belonging to the Plaintiff, being the cypress lumber furnished to the Defendants and/or the Plaintiff's share of the sales proceeds thereof.

16.

The Defendants are aware that the Plaintiff is the rightful owner of said property and/or monies, and the Plaintiff has demanded possession of the same.

17.

The Defendants wrongfully retained the aforesaid property and/or monies without returning the full amount to the Plaintiff and without paying the sums expected and required to be paid.

The Plaintiff would show that the Defendants have converted said property and/or monies maliciously, willfully, and wantonly, with the intent to deprive the Plaintiff of his property and that they converted the property to their own use through devious and sundry means, being an act of trover.

19.

The Plaintiff demands damages from the Defendants in the way of actual and punitive damages for the willful, wanton and malicious action of the Defendants, as well as attorney's fees and all other remedies available to the Plaintiff under Mississippi law.

COUNT THREE UNJUST ENRICHMENT

20.

The Plaintiff hereby reasserts and realleges each and every one of the foregoing paragraphs as if restated in full herein.

21.

The Plaintiff would assert that to allow Defendants to wrongfully retain the Plaintiff's lumber and/or monies of Plaintiff in violation of the terms of the parties' agreement as set forth hereinabove would constitute unjust enrichment of the Defendants at the expense and to the detriment of the Plaintiff.

22.

The Plaintiff reasserts his claims for compensatory damages, together with attorney's fees, costs, pre-judgment and post-judgment interest as set forth hereinabove.

Page 6 of 11

COUNT FOUR EQUITABLE TRUST

23.

The Plaintiff hereby reasserts and realleges each and every one of the foregoing paragraphs as if restated in full herein.

24.

The Plaintiff would assert that an equitable Trust was created by the acts of the parties and this Court should enforce the same for the benefit of the Plaintiff.

25.

The Plaintiff reasserts his claims for compensatory damages, together with attorney's fees, costs, pre-judgment and post-judgment interest as set forth hereinabove.

COUNT FIVE FRAUD AND FRAUD IN THE INDUCEMENT

26.

The Plaintiff hereby reasserts and realleges each and every one of the foregoing paragraphs as if restated in full herein

27.

At all times material hereto Plaintiff was relying upon Defendants to abide by the terms of their agreement based upon inducements made to the Plaintiff by the Defendants and to honor the contractual obligations and to deal with the Plaintiffs fairly and honestly.

28.

Defendants made representations to Plaintiff which were false and which the Defendants knew or should have known were false and intended for Plaintiff to rely upon them which has caused the Plaintiff damages as set forth hereinabove.

29.

Plaintiff demands damages from the Defendants in the way of actual and punitive damages for said fraud, as well as attorney fees and all other remedies available to Plaintiff under Mississippi and Federal law.

COUNT SIX DISGORGEMENT

30.

The Plaintiff hereby realleges and incorporates each and every preceding paragraphs as if fully set forth herein in this cause of action.

31.

The Defendants have made profits by wrongful conducted described herein by the receipt of fees, monies or other financial consideration.

32.

Each of the Defendants should be order to disgorge themselves of all such benefits received as a result of the conduct described herein.

COUNT SEVEN PIERCING THE CORPORATE VEIL

33.

The Plaintiff hereby realleges and incorporates each and every preceding paragraphs as if fully set forth herein in this cause of action.

Page 8 of 11

One or more of the Defendants engaged in inappropriate behavior which contributed to and caused the damages to the Plaintiff.

35.

The Defendants actions were taken individually by and through one or more entities including Branch Woods which caused damages to the Plaintiff.

36.

Plaintiff is entitled to pierce the corporate veil of Branch Woods and to hold the named Defendant, Branch, who is its officer and member jointly and severally liable and responsible for said actions and the damages caused thereby.

37.

The Defendants have made profits by wrongful conducted described herein by the receipt of monies or other financial consideration.

38.

In addition, Branch Woods has grossly inadequate capital due to the actions of the Defendants.

39.

Furthermore, Branch Woods is an instrumentality of the other named Defendants, the Defendants own all or a majority of the stock in Branch Woods, the Defendants are directors, officers and shareholders of Branch Woods, and the Defendants received salaries, benefits and dividends from Branch Woods.

The formal legal requirements for Branch Woods to act as a separate and independent entity have been ignored by the Defendants.

41.

Plaintiff further alleges that Branch Woods exists to aid the Defendants in perpetrating the fraud described herein, and is therefore a sham designed to subvert the ends of justice.

42.

Furthermore Branch Woods is managed by one or more of the named Defendants.

43.

The Plaintiff reserves the right to provide further evidence to pierce the corporate veil at the time of trial.

44.

Plaintiff demands a judgment against all Defendants jointly and severally under this Count for the damages described herein.

COUNT EIGHT PUNITIVE DAMAGES

The Plaintiff hereby realleges and incorporates each and every preceding paragraph as if fully set forth herein in this cause of action.

46.

The Plaintiff would assert that the actions of the Defendants so depart from the standard of fair dealings and customs to constitute a separate tort. Based upon the Defendants' intentional concealment of material facts, malice, wilful and wanton conduct and reckless and callous

Page 10 of 11

disregard for the rights of the Plaintiff, Plaintiff is entitled to punitive damages in an amount of not less than One Hundred Thousand Dollars (\$100,000.00) to punish and set an example of the Defendants to deter this conduct by other parties, together with attorneys fees, interest as set forth above and all other damages.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff, Michael McKay, demands judgment against the Defendants, William Branch and Branch Antique Heartpine and Cypress, LLC, (jointly and severally) in an amount not less than \$96,664.25, together with an award for punitive damages of not less than \$100,000.00, for a total judgment of \$196,664.25, together with pre-judgment and post judgment interest at the rate of Eight Percent (8%) per annum until paid in full. Plaintiff prays for such other relief as this Court may deem appropriate.

RESPECTFULLY SUBMITTED.

MICHAROMCKA

BY: SCHWARTZ ORGLER & JORDAN, PLLC

BY:

Robert T. Schwartz, for the firm

ROBERT T. SCHWARTZ, ESQ. (MSB# 10482) JEFFREY W. BERTUCCI, ESQ. (MSB# 102676) Schwartz, Orgler & Jordan, PLLC 2355 Pass Road Biloxi, MS 39531 Telephone: (228) 388-7441 Facsimile: (228) 388-7442

robert@sojlaw.net jeff@sojlaw.net

COVER SHEET	Court Identification Docket Number	Case Year Docket Number
Civil Case Filing Form	2/4/1/0	2012
(To be completed by Attorney)	Party County # Judios CountD	20 2
Prior to Filing of Pleading	District (CH. Ct. CO)	
r nor to ruing or riedaing,		
	1000000	Local Docker
sissippi Supreme Court	I CPI I PI I C	
and the second law of the seco	Form ACC/01 Month Date Year Revised 1/1/2001)	41/
	This area to be completed by cle	Case Number if filed prior to
IN THE COL	INTY COURT OF ULBRICON	/-//-/
on Style of Case: MICHAEL McKAV ve t	WILL DO ANSCHLET AT	-1/A SOUNTY
ny rinny india Pleading: Type/Print Name	POREDIT COUNTY FOO	11/1//
Check (7) if Not an Attorney	Check (✓) if Pro Hac Vice Signature	MS Bar No. 10482
mpensatory Damages Sought: \$	Punitive Damages Sought	
Child Support contemplated as an issue	in this suit?Yes / No If you is	checked, please submit a completed Child Support
	Informatio	
INTIFF - PARTY(IES) INITIALLY BRINGING SUIT SH	OULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE	e) - Enter Additional Plaintiffs on Separate Form
vidual McKAY :	MICHAEL (EVENT PRODUTORAL FLAINTIFFS ON SEPARATE FORM
Last Name	Circl Massa	
Address of Plaintiff 365 LAKEVIEW BLV	D. BILOVI MC 20521	in Name, if Applicable Middle Init. JinSmith
"Cueck (A.) is sudividual Elatum is active to	capacity as Executor(trix) or Administrator(trix) of a	an Estate and optor at Ja
Check (/) if Individual Plaintiff is acting in o	capacity as Business Owner/Operator (d/b/a) or St	tate Anency and enter notice
		and Agency, and enter entry.
iness		
Chart (C) If D Enter legal name	of business, corporation, partnership, agency - If Corporation, is	02021e state where incomprated
The state of the s	n the name of an entity other than the above, and	enter below:
ENDANT - NAME OF DEFENDANT (FIRST NAME IS	N SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS O	N SEPARATE FORM
idual BRANCH		IT OLFARATE FORM
Last Name	WILL ()
Check (/) if individual Defendant is action in	Maider in capacity as Executor(trix) or Administrator(trix) or	Name, if Applicable Middle Inc. Jr/Smilin
Check (/) if Individual Defendant is acting it	n capacity as Business Owner/Operator (d/b/a) or	Water & Court of the Court of t
		State Agency, and enter entity:
		State Adency, and enter entity.
iness DEFENDANTS ADDRESS: 520 ST.	AUGUSTINE STREET, BOGALUSA, LA 70427	THE SECOND CONTRACTOR AND SECOND CONTRACTOR OF THE SECOND CONTRACTOR OF
iness <u>DEFENDANT'S ADDRESS: 520 ST.</u> Enter legal name: Check (/) if Business Defendant is being si	AUGUSTINE STREET, BOGALUSA, LA 70427	THE SECOND SECOND ASSOCIATION OF THE SECOND
iness <u>DEFENDANT'S ADDRESS: 520 ST.</u> Enter legal name : Check (/) if Business Defendant is being st D/B/A:	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - if Corporation, in used in the name of an entity other than the above,	THE STATE OF THE S
iness DEFENDANT'S ADDRESS: \$20 ST. Enter legal name Check (*/) If Business Defendant is being st D/B/A: DRNEY FOR THIS DEFENDANT:	AUGUSTINE STREET, BOGALUSA, LA 70427	ndicate state where incorporated and enter below.
iness DEFENDANT'S ADDRESS: \$20 ST. Enter legal name Check (*/) if Business Defendant is being st D/B/A: DRNEY FOR THIS DEFENDANT: (If known)	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - if Corporation, in used in the name of an entity other than the above, Bar No. or Name:	THE SECOND SECOND ASSOCIATION OF THE SECOND
iness DEFENDANT'S ADDRESS: 520 ST. Enter legal name: Check (/) if Business Defendant is being st D/B/A: D/BRAY FOR THIS DEFENDANT: (If known) If hand cofumn, check one (1) box that best defendant is being st thand cofumn, check one (1) box that best defendant is being st thand cofumn, check one (1) box that best defendant is being st thand cofumn, check one (1) box that best defendant is being st thand cofumn, check one (1) box that best defendant is being st thand cofumn, check one (1) box that best defendant is being st thand cofumn.	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation partnership, agency - if Corporation, in used in the name of an entity other than the above, Bar No. or Name:	and enter below. Pro Hac Vice (V)
iness DEFENDANT'S ADDRESS: 520 ST. Enter legal name: Check (/') if Business Defendant is being st D/B/A: DRNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best disature of this suit. In right hand column check	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - if Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate k all Accounting (Probate)	and enter below. Pro Hac Vice (V)
iness DEFENDANT'S ADDRESS: 520 ST. Enter legal name: Check (/) if Business Defendant is being st D/B/A: DRNEY FOR THIS DEFENDANT: (If known) If hand column, check one (1) box that best d lature of this suit. In right hand column check is which indicate secondary claims.	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction	and enter below. Pro Hac Vice (V) Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor
Iness DEFENDANT'S ADDRESS: \$20 ST. Enter legal name Check (*/) if Business Defendant is being st D/B/A: DRINEY FOR THIS DEFENDANT: (If known) If hand cofumn, check one (1) box that best d sature of this suit. In right hand cofumn chec. If which indicate secondary claims. Business/Commercial	AUGUSTINE STREET, BOGALUSA, LA 70427 of business corporation partnership apency - If Corporation in ued in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment	and enter below. Pro Hac Vice (V) Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority
These DEFENDANT'S ADDRESS: 520 ST. Enter legal name of DrB/A: Check (*/) if Business Defendant is being st DrB/A: DrB/A: (If business Defendant is being st DrB/A: (If known) If hand column, check one (1) box that best disture of this suit. In right hand column check which indicate secondary claims. Business/Commercial Accounting (Business)	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship	Adoption - Non-Domestic Adoption - Non-Contested Consert to Abortion for Minor Other
Check (/) if Business Defendant is being st D/B/A: Check (/) if Business Defendant is being st D/B/A: Check (/) if Business Defendant is being st D/B/A: (If Brown) If hand cotumn, check one (1) box that best d ature of this suit. In right hand column check which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptcy	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - if Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cameliment Conneitment Conneitment Guardianship	and enter below. Pro Hac Vice (V) Children and Minors - Non-Domestic Adoption - Non-Contested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury
ness DEFENDANTS ADDRESS: \$20 ST. Enter legal name Check (*/) If Business Defendant is being st D/B/A: RNRY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check a which indicate secondary claims. Business/Commercial Accounting (Business/Commercial Accounting (Business/Commercial Business Dissolution - Corporation Business Dissolution - Partnership	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship	Adoption - Non-Domestic Adoption - Non-Comestic Adoption - Non-Comestic Adoption - Non-Office (V) Children and Minors - Non-Domestic Adoption - Non-Contested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury
Check (/) If Business Defendant is being st D/B/A: Check (/) If Business Defendant is being st D/B/A: Check (/) If Business Defendant is being st D/B/A: Check (/) If Business Defendant is being st D/B/A: Check (/) If Business Defendant is being st D/B/A: Check one (1) box that best diature of this suit. In right hand column check awhich indicate secondary claims. Business/Commercial Accounting (Business) Business/Dissolution - Corporation:	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Buth Certificate Correction Cammitment Conservatorship Guardianship Heitship	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Aborton for Minor Pother Torts-Personal Injury Fraud
ness DEFENDANTS ADDRESS: \$20 ST. Enter legal name of the suit. In right hand column checks a which indicate secondary claims. Business/Commercial Accounting (Business) Business/Commercial Accounting (Business) Business Dissolution - Corporation- Business Dissolution - Partnership Debt Collection Employment	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Bush Certificate Correction Commitment Conservationship Heistahe Intestate Estate Muniment of Title	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium
Check (/) If Business Defendant is being st DIBIA: Check (/) If Business Defendant is being st DIBIA: CRNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptcy Business Dissolution - Partnership Debt Collection Employment Examination of Debtor	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship Guardianship Heishship Intestate Estate Minor's Settlement Muniment of Title Name Change	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Aborton for Minor Removal of Minority Other Torts-Personal Injury Fraud
The secondary control of the secondary control	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - if Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Connervatorship Guardianship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anoney	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Legal
ness DEFENDANTS ADDRESS: \$20 ST. Enter legal name of the properties of the properti	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Bush Certificate Correction Commitment Conservationship Heitship Intestate Estate Muniment of file Name Change Power of Anomey Testate Estate Vestate Vest	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Perpud of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortum Malpractice - Lagal Matbractice - Medical
ness DEFENDANTS ADDRESS: \$20 ST. Enter legal name Check (/) If Business Defendant is being st D/B/A: RNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check a which indicate secondary claims, Business/Commercial Accounting (Business) Business Dissolution - Corporation Business Dissolution - Partnership Debt Collection Employment Examination of Debtor Exocution Foreign Judgment Garnschment	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anoney Teatate Estate Will Contest	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Legal Malpractice - Medical Negligence - General Negligence - General Negligence - Motor Vehicle Products Lieolity
ness DEFENDANTS ADDRESS: \$20 ST. Enter legal name Check (/) If Business Defendant is being st D/B/A: RNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check a which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptcy Business Dissolution - Corporation Business Dissolution - Partnership Dest Collection Employment Employment Exammation of Debtor Execution Foreign Judgment Garmshivent Pension	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Campitment Conservatorship Guardianship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Frau Loss of Consortium Malpractice - Legal Negligence - General Negligence - Motor Vehicle Products Liability Wrongfur Death
ness DEPENDANTS ADDRESS: \$20 ST. Enter legal name of the company	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, patraviship, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Conservationship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomely Teatate Estate Will Corriest Other Statutos/Rules	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Frau Loss of Consortium Malpractice - Lega Meloractice - Medicel Negligence - Motor Vehicle Products Leolity Wongfur Death Other
ness DEFENDANTS ADDRESS: \$20 ST. Enter legal name Check (/) If Business Defendant is being st D/B/A: RNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check is which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptor Business Dissolution - Corporation Business Dissolution - Partnership Deot Collection Employment Examination of Debtor Execution Foreign Judgment Garmishment Pension Receivership Receivership Stockholder Suit	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Campitment Conservatorship Guardianship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Matpractice - Legal Malpractice - Medicel Neglipence - Motor Vehicle Products Liability Wrongfur Death Other Mass Tort
ness DEFENDANTS ADDRESS: \$20 ST. Enter legal name Check (/) If Business Defendant is being st D/B/A: RNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check is which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptor Business Dissolution - Corporation Business Dissolution - Partnership Deot Collection Employment Examination of Debtor Execution Foreign Judgment Garmishment Pension Receivership Receivership Stockholder Suit	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - if Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anoniey Teatate Estate Will Contest Other Statutea/Rules Bond Validation	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Frau Loss of Consortium Malpractice - Legal Malpractice - Medical Negligence - General Negligence - Motor Vehicle Products Liscolity Wrongfur Death Other Mass Tert Asbestes
The series of this suit. In right hand column check which indicate secondary claims. Business/Commercial Accounting (Business) Business Dissolution - Corporation Business Dissolution - Partnership Debt Coffection Employment Examination of Debtor Execution Foreign Judgment Garnishment Pension Receivership Replovin Stockholder Suit Citter Domestic Relations	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Campitment Conservatorship Guardianship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutea/Rules Bond Validation Cvivi Forfoliums	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Back Faith Fraud Loss of Consortium Malpractice - Legal Malpractice - Medical Negligence - Motor Vehicle Products Leolity Wrongfur Death Other Mass Tort Asbestos Ghomical Spill
Enter legal name Check (/) If Business Defendant is being st D/B/A: RNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check a which indicate secondary claims, Business/Commercial Accounting (Business) Bankruptcy Business Dissolution - Corporation Business Dissolution - Partnership Debt Collection Employment Examination of Debtor Exocution Foreign Judgment Garnishment Pension Receivership Boomestic Relations Child Custody/Valkation	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship Heistship Intestate Estate Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutes/Rules Bond Validation Civil Forfeiture Dectaratory Judgment ERISA Eminert Domain	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Legal Meloractice - Medical Negligence - General Negligence - Motor Vehicle Products Lieolity Wrongfur Death Other Mass Tort Asbestos Chomical Spill Down
The section of Debtor Examination of Debtor	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, patraership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship Guardenship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomely Teatate Estate Will Contest Other Statutes/Rules Bond Validation Divil Forfeiture Dectaratory Judgment ERISA Eminent Domain Extraordinary Verti	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Back Faith Fraud Loss of Consortium Malpractice - Legal Malpractice - Medical Negligence - Motor Vehicle Products Leolity Wrongfur Death Other Mass Tort Asbestos Ghomical Spill
The second of th	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Bith Certificate Correction Cammitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutea/Rules Bond Velidation Dive Forfoliure Dectaratory Judgment ERISA Eminent Domain Extraordinary Writt Federal Statutes	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Aborton for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Legal Malpractice - Medical Negligence - Motor Vehicle Products Liadility Wrongfur Death Other Mass Tort Asbestos Chémical Spill Droxin
Enter legal name Check (/) If Business Defendant is being st D/B/A: PRNEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best d ature of this suit. In right hand column check a which indicate secondary claims. Business/Commercial Accounting (Business) Business Dissolution - Corporation Business Dissolution - Partnership Debt Collection Expalyment Examination of Debtor Examination of Debtor Examination Garrishment Pansion Receiversite Receiversite Receiversite Business Dissolution Contempt Domestic Relations Child Gustody/Anklation Child Gustody/Anklation Child Gustody/Anklation Child Gustody/Anklation Child Gustody/Anklation Child Gustody/Anklation Child Support Contempt Divorce, Fault	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - if Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Conservatorship Heistship Intestate Estate Minor's Settlement Muniment of file Name Change Power of Anoney Testate Estate Vill Contest Other Statutea/Rules Bond Validation Dive Forfeiture Dectarativy Judgment ERISA Eminent Domain Sxtraordinary Vivil Federal Statutes Injunction or Restraining Order	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Perpoval of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Lagal Malpractice - Medical Negligence - General Negligence - General Negligence - General Negligence - More Vehicle Products Liacility Wrongfur Death Other Mass Tort Asbestos Chomical Spill Dossn HandVarm Vibration Hearing Loss Radioactive Materials Other
ness DEPENDANTS ADDRESS: \$20 ST. Enter legal name of the company	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, patraership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Concernationship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomely Teatate Estate Will Contest Other Statutos/Rules Bond Velidation Divil Forfeiture Dectaration Judgment ERISA Eminent Domain Sxtraordinary Verti Federal Statutes Municipal Annexation	Children and Minors - Non-Domestic Adoption - Non-Contested Consert to Abortion for Minor Removal of Minority Cither Torts-Personal Injury Bad Faith Frau Loss of Consortium Malpractice - Legal Negligence - General Negligence - General Negligence - Motor Vehicle Products Licelity Wrongfur Death Other Mass Tort Asbestos Chomical Spill Doxan Hand/Arm Vibration Hearing Loss Radioactive Materials Other Real Property
The second secon	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - if Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Conservatorship Heistship Intestate Estate Minor's Settlement Muniment of file Name Change Power of Anoney Testate Estate Vill Contest Other Statutea/Rules Bond Validation Dive Forfeiture Dectarativy Judgment ERISA Eminent Domain Sxtraordinary Vivil Federal Statutes Injunction or Restraining Order	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Legal Malpractice - Medical Neglipence - Motor Vehicle Products Liability Winnight Death Other Mass Tort Asbestos Chemical Spill Doxin Hand/Arm Vibration Hearing Loss Real Property Adverse Possession
The second secon	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Canservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutea/Rules Bond Validation Divit Forfaiture Dectaratory Judgment ERISA Eminent Domain Extraordinary Writ Federal Statutes Injunction or Restraining Order Municipal Annexation Racketeering (RICO)	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Permoval of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Lagal Malpractice - Medical Negligence - Metric Vehicle Products Liacility Wrongfur Death Other Mass Tort Asbestos Chemical Spill Dossin Handkarm Vibration Hisaning Loss Radioactive Materials Other Real Property Advesse Possession Ejectment
The second secon	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name. Probate Accounting (Probate) Bush Certificate Correction Commitment Conservationship Heistrip Intestate Estate Muniment of Title Name Change Power of Anomey Testate Estate Will Contest Other StatuteofRules Bond Validation Divit Profisure Dectaratory Judgment ERISA Eminent Domain Extraordinary Vent Federal Statutes Injunction or Restraining Order Munimpal Annexation Racketeering (RICO) Railmad Searnen Other	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Majpractice - Legal Majpractice - Medical Negligence - General Negligence - General Negligence - General Negligence - Motor Verucle Products Licolity Wirongfur Death Other Mass Tort Asbestos Chomical Spill Dooin HandXxm Vibration Heaning Loss Radioactive Materials Other Real Property Adverse Possession
Check (/) If Business Defendant is being st D/B/A: Enter legal name of D/B/A: Check (/) If Business Defendant is being st D/B/A: PRNEY FOR THIS DEFENDANT: (If known) It hand cofurns, check one (1) box that best did ature of this suit. In right hand cofurns check a which indicate secondary claims. Business/Commercial Accounting (Business) Business Dissolution - Corporation Business Dissolution - Partnership Debt Coffeebon Examination of Debtor Examination of Debtor Examination of Debtor Examination of Debtor Examination Garnishment Pansion Receivership Receivership Receivership Boomestic Relations Child Custody/Anklasion Child Support Contempt Divorce Fault Divorce Fault Divorce Teault Property Division	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - if Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship Heisship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anoniery Teatate Estate Will Contest Other Statutes/Rules Bond Validation Divit Forfaiture Dectaratory Judgment ERISA Eminent Domain Extraordinary Witt Federal Statutes Injunction or Restraining Order Municipal Annexation Racketsering (RICO) Railmad Seamen Other Appeals	Children and Minors - Non-Domestic Adoption - Noncortested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Frau Loss of Consortium Majoractice - Legal Majoractice - Medical Negligence - General Negligence - Motor Vehicle Products Ligolity Wrongfur Death Other Mass Tert Asbestos Chemical Spill Dioxin Hearing Loss Radicactive Materials Other Real Property Adverse Possession Ejectment Eminent Domain
ness DEFENDANTS ADDRESS: 520 ST. Enter legal name of the company	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Cammitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutes/Rules Bond Validation Divil Forfeiture Declaratory Judgment ERISA Eminent Domain Extraordinary Vivit Federal Statutes Injunction or Restraining Order Municipal Annexation Raitmed Searnen Other Appeals Administrative Agency	Children and Minors - Non-Domestic Adoption - Noncortested Consert to Abortion for Minor Removal of Minority Cities Torts-Personal Injury Bad Faith Frau Loss of Consortium Majoractice - Legal Majoractice - Medical Negligence - General Negligence - Motor Vehicle Products Licolity Wrongfur Death Other Mass Tert Asbestos Chemical Spill Dioxin Hearing Loss Radioactive Materials Other Real Property Adverse Possession Ejectment Eminent Domain Judicial Forectiosure Lies Assertion Partition
Interior in the interior in th	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Bush Certificate Correction Cammitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutea/Rules Bond Validation Dive Forfoliure Dectaratory Judgment ERISA Eminent Domain Extraordinary (Virtit Federal Statutes Injunction or Restraining Order Municipal Annexation Racketeering (RICO) Railmad Searnen Other Appeals Administrative Agency County Court	Children and Minors - Non-Domestic Adoption - Noncontested Consent to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Legal Malpractice - Medical Neglipence - Motor Vehicle Products Liability Wrongfur Death Other Mass Tort Asbestos Chomical Spill Droxen Hand/Arm Vibration Hearing Loss Real Property Adverse Possession Ejectment Eminent Domain Judicial Poreclosurie Lian Assertion Partition Receiver Appointment
Enter legal name Check (*/) If Business Defendant is being st D/B/A: PRINEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best did ature of this suit. In right hand column check is which indicate secondary claims. Business/Commercial Accounting (Business) Business Dissolution - Corporation Business Dissolution - Partnership Debt Collection Examination of Debtor Examination of Debtor Examination of Debtor Examination Gameshiment Pansion Receivership. Replevin Stockholder Suit Citier Domestic Relations Child Custody/Anklasion Child Support Contempt Divorce Fault Divorce Fault Divorce irreconcilable Differences Emancipation Modification Pateminy Property Division Saparate Maintenance Termination of Parental Rights UIFSA (formerly URESA)	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - if Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Buth Certificate Correction Cammitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anoning Teatre Estate Will Confest Other Statutes/Rules Bond Validation Divit Forfalture Dectaratory Judgment ERISA Eminent Domain Extraordinary (Vrin Federal Statutes Injunction or Restraining Order Municipal Annexation Racketsering (RICO) Railmad Searnan Other Appeals Administrative Agency County Court Hardship Patition (Driver License)	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Malpractice - Lagal Mathractice - Medical Negligence - General Negligence - General Negligence - Motor Vehicle Products Licelity Wrongfur Death Other Mass Tort Asbestos Chomical Spill Dosin Hand/Arm Vibration Hearing Loss Redioactive Materials Other Real Property Adverse Possession Ejectment Eminent Domain Judicial Foredosute Lien Assertion Partition Receival Appointment Tas Sale Confirmation/Cancestation
Enter legal name Check (*/) If Business Defendant is being st D/B/A: PRINEY FOR THIS DEFENDANT: (If known) It hand cofumn, check one (1) box that best disture of this suit. In right hand cofumn check a which indicate secondary claims. Business/Commercial Accounting (Business) Business Dissolution - Corporation Business Dissolution - Partnership Debt Collection Employment Examination of Debtor Examination of Debtor Examination of Debtor Examination of Debtor Examination Contempt Domestic Relations Child Custody/Neidston Soparet Amintenance Emanopation Modification Patemity Property Division Separets Maintenance Termination of Parential Rights UFSA (formerly URESA) Other	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutos/Rules Bond Validation Divil Forfeiture Declaratory Judgment ERISA ERISA Declaratory Judgment ERISA ERISA Declaratory Judgment ERISA ERISA Declaratory Judgment ERISA ERISA Agency Count Municipal Annexation Racketeering (RICO) Railmoad Searnen Other Appeals Agency Count Hardship Petbon (Oniver License) Justice Court	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraul Loss of Consortium Malpractice - Legal Malpractice - Medical Negligence - Medical Negligence - Medical Products Legicity Wrongfur Death Other Mass Tort Asbestos Chemical Spill Doxin Hearing Loss Redicactive Materials Other Real Property Adverse Possession Ejectment Eminent Domain Judicial Foreclosure Less Aspertion Partition Receiver Appointment Tax Sale Confirmation/Cancestation Title Boundary ∨ Essermant
Interior and the contract of t	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, patraership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Bush Certificate Correction Commitment Conservationship Heisthip Intestate Estate Muniment of Title Name Change Power of Anomey Testate Estate Will Contest Other Statuteor/Rules Bond Validation Divit Profesure Dectaratory Judgment ERISA Eminent Domain Extraordinary Vent Federal Statutes Injunction or Restraining Order Municipal Annexation Racketsering (RICO) Railmad Searnen Other Appeals Administrative Agéncy County Court Hardship Petition (Driver License) Justice Court MS Employmt Security Commit	Children and Minors - Non-Domestic Adoption - Noncontested Consers to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Majpractice - Legal Majpractice - Medical Negligence - General Negligence - General Negligence - Medical Negli
Enter legal name Check (/) If Business Defendant is being st D/B/A: PRNEY FOR THIS DEFENDANT: (If brown) It hand cofurns, check one (1) box that best d ature of this suit. In right hand cofurn check a which indicate secondary claims. Business/Commercial Accounting (Business) Business Dissolution - Corporation Business Dissolution - Partnership Debt Cofection Employment Examination of Debtor Examination of Debtor Examination Garrishment Pansion Receivership Receivership Browner Bust Domestic Relations Child Custody/Nakation Child Support Contempt Divorce Treconcilable Differences Emancipation Modification Patently Patently Patently Patently Patently Patently UIFSA (formerly URESA) Other Contract Breach of Contract Breach of Contract Breach of Contract	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Teatate Estate Will Contest Other Statutos/Rules Bond Validation Divil Forfeiture Declaratory Judgment ERISA ERISA Declaratory Judgment ERISA ERISA Declaratory Judgment ERISA ERISA Declaratory Judgment ERISA ERISA Agency Count Municipal Annexation Racketeering (RICO) Railmoad Searnen Other Appeals Agency Count Hardship Petbon (Oniver License) Justice Court	Children and Minors - Non-Domestic Adoption - Noncontested Conserv to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Failt Fraud Loss of Consortium Malpractice - Lagal Malpractice - Medical Negligence - General Negligence - General Negligence - General Negligence - Hotor Vervicle Products Liability Wrongful Death Other Mass Tort Asbestos Chomical Spill Dosen Hand/Arm Vibration Hearing Loss Radioactive Materials Other Real Property Adverse Possession Ejectment Errithent Domain Judicial Foreclosure Lien Assertion Parution Receivel Appointment Tax Sale Confirmation/Cancestation Title Boundary Arc Easement Cytill Rights
Enter legal name of Check (**) If Business Defendant is being st D/B/A. Check (**) If Business Defendant is being st D/B/A. DRINEY FOR THIS DEFENDANT: (If known) It hand column, check one (1) box that best disture of this suit. In right hand column checks which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptory Business Dissolution - Partnership Debt Collection Employment Examination of Debtor Execution Foreign Judgment Garisshment Parasion Receivership Reployen Stockholder Suit Contempt Divorce Fault Divorce Imaningpation Patently Property Division Saparate Maintenuance Termination of Parential Rights UFSA (formerty URESA) Other Contract Breach of Contract Installment Contract Install	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Bush Certificate Correction Commitment Conservationship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Testate Estate Will Contest Other Statutes/Rules Bond Validation Divil Forfeiture Dectaratory Judgment ERISA Eminent Domain Extraordinary Vvm Federal Statutes Injunction or Restraining Order Municipal Annexation Racketeering (RiCO) Railmod Seame Other Appeals Administrative Agency County Court Hardship Petition (Driver License) Justice Court Mis Employm: Security Commin Municipal Court Out & Sigal Board Workers Compensation	Children and Minors - Non-Domestic Adoption - Noncontested Consers to Abortion for Minor Removal of Minority Other Tosts-Personal Injury Bad Failh Fraud Loss of Consortium Malpractice - Legal Malpractice - Medical Negligence - Motor Vehicle Products Liagolity Wrongful Death Other Mass Tort Asbestos Chemical Spill Dioxin Hand/Arm Vibration Hearing Loss Radioactive Materials Other Real Property Adverse Possession Ejectment Eminent Domain Judicial Foreclosurie Lies Assertion Partition Received Appointment Tax Sale Confirmation/Cancetation Title Boundary ∨ Essertian Other Civil Rights Elections
Iness DEFENDANTS ADDRESS: \$20 ST. Enter legal name of Check (**) if Business Defendant is being st D/B/A: DRNEY FOR THIS DEFENDANT: (If known) If hand column, check one (1) box that best disture of this suit. In right hand column checks which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptcy Business Dissolution - Corporation: Business Dissolution - Partnership Debt Collection Employment Examination of Debtor Execution Foreign Judgment Gameshment Parasion Receivership Replevin Stockholder Suit Cotter Domestic Relations Child Custody/Nexasion Child Custody/Nexasion Contiempt Divorce Fault Contract Divorce Tomestic Abuse Emanalpabon Modification Paternity Property Division Separate Maintenance Termination of Parential Rights UFFSA (formerly URESA) Other Contract Breach of Contract Installment Contract Ins	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, apency - If Corporation, in used in the name of an entity other than the above, Bat No. or Name: Probate Accounting (Probate) Birth Certificate Correction Commitment Conservatorship Guardianship Heistship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anoney Teatate Estate Will Contest Other Statutes/Rules Bond Validation Civil Forfoliture Dectaratory Judgment ExtSA Eminent Domain Extraordinary Vivil Federal Statutes Municipal Annexiation Racketeering (RiCO) Railmad Seamen Other Appeals Administrative Agéncy County Court Hardship Petition (Driver Licensie) Justice Court MS Employm: Security Commin Municipal Court On & Gas Board	Children and Minors - Non-Domestic Adoption - Noncontested Conserv to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Failt Fraud Loss of Consortium Malpractice - Lagal Malpractice - Medical Negligence - General Negligence - General Negligence - General Negligence - Hotor Vervicle Products Liability Wrongful Death Other Mass Tort Asbestos Chomical Spill Dosen Hand/Arm Vibration Hearing Loss Radioactive Materials Other Real Property Adverse Possession Ejectment Errithent Domain Judicial Foreclosure Lien Assertion Parution Receivel Appointment Tax Sale Confirmation/Cancestation Title Boundary Arc Easement Cytill Rights
Iness DEFENDANTS ADDRESS: \$20 ST. Enter legal name of Check (**) if Business Defendant is being st D/B/A: DRNEY FOR THIS DEFENDANT: (If known) If hand column, check one (1) box that best disture of this suit. In right hand column checks which indicate secondary claims. Business/Commercial Accounting (Business) Bankruptor Business Dissolution - Corporation Business Dissolution - Partnership Debt Collection Employment Examination of Debtor Execution Receivership Receivership Receivership Replayment Contract Child Custody/Naviasion Child Gustody/Naviasion Child Gustody/Naviasion Child Gustody/Naviasion Child Support Contempt Divorce Fault Divorce Irreconcilable Differences Domestic Abuse Emancipation Patently Property Division Saparate Maintenuance Termination of Parental Rights UFSA (formerly URESA) Other Contract Breaach of Contract insurance	AUGUSTINE STREET, BOGALUSA, LA 70427 of business, corporation, partnership, agency - If Corporation, in used in the name of an entity other than the above, Bar No. or Name: Probate Accounting (Probate) Bush Certificate Correction Commitment Conservationship Heitship Intestate Estate Minor's Settlement Muniment of Title Name Change Power of Anomey Testate Estate Will Contest Other Statutes/Rules Bond Validation Divil Forfeiture Dectaratory Judgment ERISA Eminent Domain Extraordinary Vvm Federal Statutes Injunction or Restraining Order Municipal Annexation Racketeering (RiCO) Railmod Seame Other Appeals Administrative Agency County Court Hardship Petition (Driver License) Justice Court Mis Employm: Security Commin Municipal Court Out & Sigal Board Workers Compensation	Children and Minors - Non-Domestic Adoption - Noncontested Consert to Abortion for Minor Removal of Minority Other Torts-Personal Injury Bad Faith Fraud Loss of Consortium Majpractice - Legal Majpractice - Medical Negligence - General Negligence - General Negligence - Medical Negli

D2401-19-1534

	11 11 11 <u>C</u>	OUNTY	COURT OF HARRISON	COUNTY, MISSISSIPPI
	FIR	ST	JUDICIAL DISTRICT, C	
Docket No.	2			8
		Chronological No.	Clerk's Local ID	Docket No. If Filed Prior to 1/1/94
	DEF IN ADDITI	FENDANTS IN REION TO DEFEND	FERENCED CAUSE - Pag ANT SHOWN ON CIVIL CA	e 1 of Defendants Pages ASE FILING FORM COVER SHEET
Defendant :				
Individual:	Last			1
			First Name	Maiden Name, if Applicable Middle Init. Jr/Sr/IIu/V
Oricox (V	af	relendant is acting i	n capacity as Executor(trix) or	Administrator(trix) of an Estate, and enter style:
Check (/) if Individual Da	afandantia and		
D/B/A	i i muividual De	elendant is acting in	capacity as Business Owner/O	perator (D/B/A) or State Agency, and enter that name belo
			An in the House Of SH Ciffith Offi	Reg. Agent, Viron Will Branch 2 Founder's Dr. Bogalusa, IA 70427 er than the name above, and enter below
ATTORNEY FOR	THIS DEFENDA)	NT:Bar# o	Name:	Pro Hac Vice (✓) Not an Attorney(✓)
	IOHN DOES 1 Last N		First Name (Maiden Name, if Applicable Middle Init In/Snitting
Check (/) Estate cCheck (/)	if Individual De of if Individual Del	efendant is acting in	capacity as Executor(trix) or a	erator (D/B/A) or State Agency, and enter that name below
Check (✓) Estate oCheck (✓) D/B/A	if Individual De of if Individual Del	efendant is acting in	capacity as Executor(trix) or a	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name below
Check (/) Estate cCheck (/) D/B/A _ Business Check (/)	if Individual De of if Individual Det Enter legal if Business Def	efendant is acting in certain fendant is acting in certain acting in acting	capacity as Executor(trix) or a capacity as Business Owner/Operation, partnership, agency - if Corporated in the name of an entity other	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name belo
Check (/) Estate of Check (/) D/B/A _ Check (/) D/B/A _	if Individual De	efendant is acting in content in acting in content is acting in content in acting in content in acting in acting successions.	capacity as Executor(trix) or a capacity as Business Owner/Operation, parmership, agency - if Corporated in the name of an entity other	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name belowers, indicate state where incorporated.
Check (✓) Estate of Check (✓) D/B/A _ Check (✓) D/B/A _ TTORNEY FOR	if Individual De of if Individual Del Enter legal if Business Def	efendant is acting in content in acting in content is acting in content in acting in content in acting in acting successions.	capacity as Executor(trix) or a capacity as Business Owner/Operation, parmership, agency - if Corporated in the name of an entity other	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name belowing, indicate state where incorporated er than the name above, and enter below:
Check (/) Estate of Check (/) D/B/A _ Business Check (/) if D/B/A _ TTORNEY FOR	if Individual De of	efendant is acting in content is acting in content is acting in content in acting in acting in acting in acting in acting in acting in a	capacity as Executor(trix) or a capacity as Business Owner/Operation, parmership, agency - if Corporated in the name of an entity other Name:	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name belowing the state where incorporated er than the name above, and enter below:
Check (/) Estate of Check (/) D/B/A _ Susiness Check (/) i D/B/A _ TTORNEY FOR refendant #4 adividual: _ Check (/) i	if Individual Design of Last National Design of Last National Design of Individual Design of	efendant is acting in of fendant is acting in of fendant is being sue endant is being sue endant is acting in fendant is acting in	capacity as Executor(trix) or Acapacity as Business Owner/Operation, parmership, agency - if Corporated in the name of an entity other Name:	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name belowing the state where incorporated at than the name above, and enter below:
Check (/) Estate of Check (/) D/B/A _ Business _ Check (/) if D/B/A _ TTORNEY FOR _ Defendant #4 adividual: _ Check (/) if Estate of Check (/) if	if Individual Design if Individual Design if Business Defit THIS DEFENDAN Last Natif Individual Design if Individ	efendant is acting in of fendant is acting in of fendant is being sue fendant is being sue fendant is acting in fendant is acting in	capacity as Executor(trix) or A capacity as Business Owner/Operation, partnership, agency - if Corporat d in the name of an entity other Name: First Name (apacity as Executor(trix) or A	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name below ion, indicate state where incorporated er than the name above, and enter below:
Check (/) Estate of Check (/) D/B/A _ Business _ Check (/) if D/B/A _ ATTORNEY FOR Defendant #/ Individual: _ Estate of Check (/) if D/B/A _ D/B/A _	if Individual Design if Indivi	efendant is acting in contendant is acting in contendant is being sue in the second in	capacity as Executor(trix) or A capacity as Business Owner/Operation, parmership, agency - if Corporated in the name of an entity other Name:	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name belo ion, indicate state where incorporated er than the name above, and enter below. Pro Hac Vice (✓) Not an Attorney(✓) Maiden Name, if Applicable Middle Init Jr/Sr/III/IV dministrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name belov
Check (/) Estate of Check (/) D/B/A _ Business _ Check (/) if D/B/A _ ATTORNEY FOR Defendant #4 Check (/) if Estate of Check (/) if D/B/A _ usiness _ Check (/) if	if Individual Design if Individual Design if Business Deficient Individual Design if Individual Design in Business Design if Individual Design in Business Design in Individual Design in Business Design in Individual Des	efendant is acting in or fendant is acting in or fendant is being sue endant is being sue fendant is acting in endant is acting in commendant in	capacity as Executor(trix) or A capacity as Business Owner/Operation, partnership, agency - if Corporate d in the name of an entity other Name:	Administrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name below ion, indicate state where incorporated er than the name above, and enter below. Pro Hac Vice (✓) Not an Attorney(✓) Maiden Name, if Applicable Middle Init Jr/Sr/III/IV dministrator(trix) of an Estate, and enter style: erator (D/B/A) or State Agency, and enter that name below

MICHAEL McKAY

PLAINTIFF

VS.

CAUSE NO. 240-12

WILL BRANCH, BRANCH ANTIQUE HEARTPINE AND CYPRESS, LLC, AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Will Branch

> 520 St. Augustine Street Bogalusa, LA 70427

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Robert T. Schwartz, the attorney for the Plaintiff, whose address is 2355 Pass Road, Biloxi, Mississippi 39531. Your response must be mailed or delivered within 30 days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this

Clerk of Harrison County, Mississippis

(Seal)

GAYLE PARKER, CIRCUIT CLERK HARRISON COUNTY PO BOX 998

Document #: 3 Filed: 09/05/2012 Page 1 of 1 Case: 24CO1:12-cv-01534

MICHAEL McKAY

PLAINTIFF

VS.

CAUSE NO. D2401-12-1534

WILL BRANCH, BRANCH ANTIQUE HEARTPINE AND CYPRESS, LLC, AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Branch Antique Heartpine and Cypress, LLC c/o Viron Will Branch, Registered Agent 1412 Founder's Drive Bogalusa, LA 70427

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Robert T. Schwartz, the attorney for the Plaintiff, whose address is 2355 Pass Road, Biloxi, Mississippi 39531. Your response must be mailed or delivered within 30 days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this

Clerk of Harrison County, Mississippi

(Seal)

BAYLE PARKER, CIRCUIT CLERK HARRISON COUNTY PO BOX 998 GULFPORT MS 39502

Case: 24CO1:12-cv-01534 Filed: 09/05/2012 Document #: 4 Page 1 of 1

MICHAEL McKAY

PLAINTIFF

VS.

CAUSE NO. <u>D2401-12-1534</u>

WILL BRANCH, BRANCH ANTIQUE HEARTPINE AND CYPRESS, LLC, AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: John Does 1-10

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Robert T. Schwartz, the attorney for the Plaintiff, whose address is 2355 Pass Road, Biloxi, Mississippi 39531. Your response must be mailed or delivered within 30 days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the day of September, 201.

Clerk of Harrison County, Mississippi

(Seal)

HARRISON COUNTY
PO BOX 998
BULFPORT, MS 39502

MICHAEL McKAY

PLAINTIFF

VS.

CAUSE NO.

D240-12-1634

WILL BRANCH, BRANCH ANTIQUE HEARTPINE AND CYPRESS, LLC, AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Will Branch
520 St. Augustine Street
Bogalusa, LA 70427

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Robert T. Schwartz, the attorney for the Plaintiff, whose address is 2355 Pass Road, Biloxi, Mississippi 39531. Your response must be mailed or delivered within 30 days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this

day of September, 2012.

Clerk of Harrison County, Mississippis

(Seal)

GAYLE PARKER, CIRCUIT CLERK HARRISON COUNTY

Case: 24CO1:12-cv-01534 Document #: 6 Fixed £05X1992012 GULFPORT. MS 39502

12 Page 1 of 2

PROOF OF SERVICE - SUMMONS

(Process Server)

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below:
FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE. By mailing (first class mail, postage prepaid), on the date stated in the attached notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender.
PERSONAL SERVICE. I personally delivered copies to the day of 2012, where I found said person in County
the day of 2012, where I found said person in County
of the State of
RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within whether County, A. I served the summons and complaint on the 13 day of September, 2012, at the usual place of abode of said person by leaving a true copy of the summons and complaint with Kunkerly, Burdetts who is the white the case may be a member of the family of the person served above the age of sixteen years and willing to receive the
summons and complaint, and thereafter on the /3 day of September, 2012, I mailed (by
first class mail, postage prepaid) copies to the person served at his or her usual place of abode where
the copies were left.
CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served.
At the time of service I was at least 18 years of age and not a party to this action.
Fee for service: \$
Name:
Address
Telephone No.
State of Louisiana Roy Susie Lops # 00/8 Process Server
County of ST. Tanymany
Personally appeared before me the undersigned authority in and for the state and county aforesaid the within named Roy Burian who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are
My Commission Expires: NOTARY PUBLIC
Wy Commission and the Commission of the Commissi
VICKIH COMPERS U #63216 r'ansnot St. Janumany runission for Life Complete 9-13-2012 VICKIH COMPERS U #63216 Page 2 of 2